

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

In re

WESTMOUNT GROUP, INC.

Debtor.

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Case No. 21-30633-HCM-11

RESPONSE OF ALBERT FLORES TO
DECLARATION OF KEYVAN PARSA

TO THE HONORABLE H. CHRISTOPHER MOTT, UNITED STATES BANKRUPTCY JUDGE:

Now comes the creditor ALBERT FLORES and files this, his Response to the Declaration of KEYVAN PARSA (Doc. #75), and for cause would show:

1.

KEYVAN PARSA and his related entities who have made or received fraudulent transfers intended to hinder, delay, or defeat the claims of ALBERT FLORES for fraud and unjust enrichment, and the claims of WESTSTAR TITLE COMPANY and FIDELITY NATIONAL TITLE INSURANCE COMPANY and for fraud and unjust enrichment, deserve to be brought to justice. KEYVAN PARSA seeks to evade that justice, by claiming (1) he did not understand how bankruptcy works, and his lawyer did not adequately explain how bankruptcy works; or PARSA would never have filed this case; and (2) the best place for the resolution of the claims of FLORES, WESTSTAR, and FIDELITY is in the 327th District Court, where the real estate notes payable to WESTMOUNT ASSETS GROUP, INC. can be liquidated. Both arguments are without merit and, like the tears of the crocodile, should evoke neither sympathy nor empathy.

2.

KEYVAN PARSA has long had his own mistaken ideas about law in this case, the worst being his self-serving conclusion that the seller who pays for the buyer's title insurance, is the beneficiary of the policy. No less than four law firms have parted ways with Mr. PARSA in state

court, over differences in how to defend him and his fellow fraudulent transferor MONTROYA PARK PLACE, INC. Mr. PARSA's latest legal fantasy is that a statement be attributed to WESTSTAR TITLE's closer TRAVIS SMITH, that there was no longer a valid lien on Tract 3 Johanssen Subdivision for RIGHT IMMIX CAPITAL as of July 1, 2020, absolved PARSA of the personal guaranty he gave to RIGHT IMMIX. (Deposition of KEYVAN PARSA, November 8, 2021). PARSA's legal nonsense hasn't abated, and each eruption spawns expensive chases for the creditors involved.

3.

The 327th District Court proceedings would afford FLORES, WESTSTAR, and FIDELITY a far lesser recourse than the Bankruptcy forum does, and PARSA is all too aware of this. He concocted the low payments scheme on the promissory notes payable to WESTMOUNT GROUP, INC. so that the insider note payors whom he controls would not have to pay much to satisfy the market value of the notes; and so that once the meager value of the notes was satisfied, from other sources, and creditors were out of the way, he could prevail upon the insiders to increase both the short and long-term yield of the notes. The strategy might be admired as ingenious, were it not so patently crooked. The notes' aggregate face value, moreover, is only \$794,000, in comparison to the \$1,461,000 that was fraudulently transferred to WESTMOUNT GROUP, INC.

WHEREFORE, PREMISES CONSIDERED, for these reasons and the other reasons stated in the Responses of the Chapter 7 Trustee, WESTSTAR, and FLORES to the Debtor's Motion to Dismiss, FLORES prays that no relief be granted upon KEYVAN PARSA's Declaration.

Respectfully submitted this 16th day of November, 2021.



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Attorney for ALBERT FLORES

CERTIFICATE OF SERVICE

I do hereby certify that on this 16th day of November, 2021, I did cause a copy of the foregoing Response of Albert Flores to Declaration of Keyvan Parsa to be mailed to Jim Rose, Attorney for the United States Trustee, 615 E. Houston, Ste. 533, P.O. Box 1539, San Antonio, TX 78295-1539; to Brad W. Odell, Subchapter V Trustee, 1500 Broadway, Ste. 700, Lubbock, TX 79401-3169; to Westmount Group, Inc., c/o Keyvan Parsa, 810 N. Kansas Street, El Paso, TX 79902-5207; to Stephen W. Sather, 7320 N MoPac Expy, Ste. 400, Austin, TX 78731; to Weststar Title, LLC, c/o James W. Brewer, 221 N. Kansas, Ste. 1700, El Paso, TX 79901-1401; and to Fidelity National Title Insurance Company, c/o Shakira Kelley, 6900 Dallas Parkway, Suite 610, Plano, Texas 75024.



/s/E.P. BUD KIRK
E.P. BUD KIRK

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